

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

In The Matter Of The Seizure Of:

33' Doral, Hull number CA-QJA01511A101;

2007 Mercedes Benz Brabus,
VIN WDDEJ71X47A004781,
bearing Maryland license plate 5AZ1570;

2011 Aston Martin Rapide,
VIN: SCFHDDAJ3BAF01116,
bearing Maryland license plate 78539CE.

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Misc. No.

Under Seal

13-2303SAG

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AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

AFFIDAVIT IN SUPPORT OF SEIZURE WARRANTS

ERIC S. NYE, a Special Agent with the Federal Bureau of Investigation, being duly sworn,
deposes and states:

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2006. Since becoming a law enforcement officer, I have participated in numerous investigations of unlawful drug trafficking, and have conducted or participated in surveillances, the execution of search warrants, the recovery of substantial quantities of narcotics and narcotics paraphernalia, and the debriefing of informants and cooperating witnesses. I have also reviewed taped conversations, as well as documents and other records relating to narcotics trafficking and money laundering. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed; the methods of payment for such drugs; the possession and use of firearms in connection with the trafficking of such drugs; and the manner in which narcotics traffickers store and conceal the proceeds of their illegal activities.

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2. During these investigations, I have examined records consisting in part of buyers' and sellers' lists, and pay/owe ledgers. I have conducted surveillance of numerous drug dealers. I have interviewed drug dealers, users and confidential informants and have discussed with them the life-style, appearance and habits of drug dealers and users. I have become familiar with the manner in which narcotics trafficker smuggle, transport, store and distribute narcotics, as well as how they collect and launder drug proceeds. I am also familiar with the manner in which narcotics traffickers use telephones, cellular telephone technology, coded communications or slang-filled telephone conversations, false or fictitious identities, and other means to facilitate their illegal activities and thwart law enforcement investigations.

I. ITEMS TO BE SEIZED

This Affidavit, in conjunction with Attachment A, is submitted in support of seizure warrants pursuant to 21 U.S.C. section 881(a)(6) for the following three items:

- A). 33' Doral (boat), Hull number CA-QJA01511A101, docked at the Baltimore Marine Center at Harborview, utilized and/or occupied by Antoine Wiggins and Eugene Thomas.
- B). 2007 Mercedes Benz Brabus, VIN WDDEJ71X47A004781, bearing Maryland license plate 5AZ1570, utilized by Anthony Miles.
- C). 2011 Aston Martin Rapide, VIN: SCFHDDAJ3BAF01116, bearing Maryland license plate 78539CE, registered to The Vaughan Group, LLC, and utilized by Antoine Wiggins.

3. Because this Affidavit and its Attachment are being submitted for the limited purpose of establishing probable cause for warrants to seize the SUBJECT PREMISES set forth above, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for each of the respective premises. The information contained in this Affidavit is based upon my personal knowledge, Federal Title III

intercepts, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. All conversations and statements described in this Affidavit and its Attachment are related in substance and in part unless otherwise indicated.

II. Probable Cause

4. This investigation began in November 2012, in east Baltimore with the targeting of WAYNE CLAYTON JONES, also known as "WEEZY," who was believed to be dealing large quantities of high-grade marijuana. JONES was known to frequent/live in the 3400 block of Clifmont Avenue in Baltimore. Based on a well-placed Confidential Witness, hereinafter referred to as CW1, your affiant was able to determine that there was not only distribution of marijuana but also the distribution of large quantities of heroin involving many more individuals. CW1, cooperating entirely of its own accord, initially provided general information as to the criminal behavior of JONES but soon provided very detailed and accurate intelligence concerning others described below¹. CW1 is not pending any criminal charges and is not being provided any consideration for any court proceeding. CW1 is being provided monetary compensation for its time and the intelligence provided.

5. On November 8, 2012, CW1 made your affiant aware of an unknown male associate of JONES, known only as "BIGS." CW1 explained that BIGS was selling heroin in Baltimore and that he was looking for a new source of supply. CW1 also explained that BIGS was supposedly on Federal supervised release for a previous Federal drug conviction. Eventually your affiant

¹ CW1 has been providing accurate and timely information to your affiant for approximately ten months. During that time your affiant has been able to corroborate almost all reporting made by CW1 as a recording device was used in a significant portion of his meetings with subjects of this investigation. Additionally, your affiant has obtained third party confirmation of CW1's reporting by obtaining private business and government surveillance video that corresponded to the CW1's reporting. Lastly, CW1's reporting has been corroborated through the multiple pen registers and the associated geopositioning data, mentioned infra. Your affiant considers CW1's reporting extremely reliable. CW1 criminal history consists of one arrest for assault in the second degree in 2007.

identified "BIGS" as ANTHONY MILES and determined that he was on federal supervised release from the 2005 conviction for possession of a firearm during the trafficking of CDS. CW1 further explained that MILES was bragging that he worked for his cousin, later identified as ENZO BLANKS, and that if CW1 had a heroin supplier his cousin would be able to pay for 1 1/2 kilograms up front. Your affiant knows, through training, knowledge, and experience, that the wholesale price of heroin coming into Baltimore is anywhere from \$60,000 to \$70,000 per kilogram. MILES also provided CW1 with his cellular telephone number of (240)559-7700. Continued reporting from CW1, based on statements from MILES, provided clarity as to the heroin distribution network of BLANKS and MILES. CW1, as explained below, provided accurate and timely intelligence concerning the heroin distribution by MILES and BLANKS.

6. Additional background and probable cause of the above mentioned heroin trafficking conspiracy, involving Anthony MILES, Eugene THOMAS, Antoine WIGGINS, and others, is set forth in Exhibit A.²

7. On July 2, 2013, surveillance was conducted at the McHenry Row apartments. A check of the secured garage revealed a white convertible Bentley with Maryland plate 6AZ2001 and a light blue Aston Martin Rapide with Maryland plate 78539CE. The Bentley is registered to 360 Telecom Solutions, LLC, and the Aston Martin was registered to the Vaughn Group. The Vaughn Group's listed agent originally was THOMAS's mother, but has since been changed to THOMAS' sister. Access to McHenry Row's garage is limited to residents with access keys. Your affiant knew this location, specifically apartment 421, to be utilized by EUGENE THOMAS and ANTOINE WIGGINS as a heroin stash house. Based on training, knowledge, and experience, your

² Exhibit A is the affidavit your affiant prepared in support of search warrants requested for this investigation. That affidavit provides additional background and probable cause of which was not duplicated for this affidavit in support of seizure warrants.

affiant knows that drug dealers will often purchase high-end automobiles and register them either in someone else's name or the name of a company to avoid detection, and seizure, by law enforcement. Additionally, based on this investigation, your affiant believes that this vehicle was purchased with drug proceeds and utilized by THOMAS and his associates, as it was parked in the secured parking for a known heroin stash house. This apartment was under 24 hour video surveillance, -in- which captured multiple drug deals and verified that although the apartment was registered to WIGGINS, it was only ever occupied by THOMAS when he was in town with heroin from Atlanta.

8. On September 9, 2013, surveillance was conducted in the vicinity of the Redwood Apartment building and associated parking garage. Your affiant knows ENZO BLANKS to maintain a residence in this building. A **2007 Mercedes Benz Brabus with Maryland license 5AZ1570**, known to be owned and operated by ANTHONY MILES, was parked in the garage. Your affiant knows, through intercepted calls, that MILES is the owner of this vehicle and that he has registered it in his aunt's name to avoid detection by law enforcement. MILES has no listed income with the state of Maryland. Your affiant knows MILES to currently be on federal supervised released for prior drug offenses and, as stated more clearly in Exhibit A, MILES has continued to sell heroin. Your affiant knows, through intercepted telephone calls, that MILES parks this vehicle at BLANKS' parking garage to avoid parking it on the street, as it is a very expensive vehicle. Your affiant believes this vehicle to be purchased with the illegal proceeds from MILES' heroin sales.

9. On September 10, 2013, surveillance was conducted at the Baltimore Marine Center at Harborview in Baltimore. A **33' Doral boat**, known to be used by THOMAS, WIGGINS, BLANKS, and KELLY was found to be docked there. Based on intercepted title III calls your affiant knows that they meet on this boat very frequently. Additionally, your affiant is aware of a boat slip agreement for this boat that was found during a Baltimore County Police search of

WIGGIN's home, located at 4150 Brown Bark Circle, which listed the boats owners as WIGGINS and THOMAS. Additionally, during that search the County Police recovered over \$80,000 in cash from the residence. Your affiant knows through this investigation, including intercepted calls, that WIGGINS has a company that he attempts to utilizes in the laundering of his heroin proceeds. Although he has this company, he has claimed very little income from it 360 Telecom Solutions, LLC with the state of Maryland. Additionally, your affiant knows, through surveillance, the lobby of this business to be empty except for a table and a few office supplies. Based on training, knowledge, and experience, your affiant believes that 360 Telecom Solutions, LLC is a front company utilized to launder drug proceeds and that WIGGINS has no source of legitimate income. Your affiant also believes that Eugene THOMAS is also generating all of his income from the sale of heroin. Your affiant believes that this boat was purchased from the income generated by the sale of heroin in the Baltimore area.

10. Based on my training and experience, I know that 18 U.S.C. section 981(b)(3) provides that "a seizure warrant may be issued ... by a judicial officer in any district in which a forfeiture action against the property may be filed ... and may be executed in any district in which the property is found...." This forfeiture case can be filed in Maryland because drug activity that generated cash drug proceeds to acquire these items took place in Maryland.

IV. Conclusion


11. Based on the foregoing, and Exhibit A, I submit that there is probable cause to believe that Antoine WIGGINS, Eugene THOMAS, and Anthony MILES were engaged in heroin trafficking in violation of 21 U.S.C. section 841, and that the following three assets were purchased with the proceeds of illegal activity, (viz. heroin trafficking) and are, therefore, forfeitable to the United States, pursuant to 21 U.S.C. section 881(a)(6):

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- A). 33' Doral, Hull number CA-QJA01511A101, docked at the Baltimore Marine Center at Harborview, utilized and owned by Antoine Wiggins and Eugene Thomas.
- B). 2007 Mercedes Benz Brabus, VIN WDDEJ71X47A004781, bearing Maryland license 5AZ1570, utilized by Anthony Miles.
- C). 2011 Aston Martin Rapide, VIN: SCFHDDAJ3BAF01116, bearing Maryland license plate 78539CE, registered to The Vaughan Group, LLC, and utilized by Antoine Wiggins.

12. Given the confidential nature of this continuing investigation, I respectfully request that this affidavit and all of the papers submitted herewith be maintained under seal until otherwise ordered by this Court.

WHEREFORE, in consideration of the facts presented, I respectfully request that this Court issue a seizure warrant for each of the items, and authorize the seizure of the items described in this affidavit.


Special Agent Eric S. Nye
Federal Bureau of Investigation

Sworn to before me this 24th day of September, 2013


Stephanie A. Gallagher
UNITED STATES MAGISTRATE JUDGE